

BUREAU OF LAND POLLUTION CONTROL

CHECKLIST FOR SURVEILLANCE PERSONNEL IN PREPARING REFERRALS TO BUREAU OF LEGAL SERVICES

Date: September 24, 1973

Region or Basin: Region 4 - Collinsville

Prepared by: Kenneth Mensing

Date forwarded to Unit Supervisor: _____

Date forwarded to Section Manager: September 24, 1973

Date forwarded to Bureau Manager: _____

Date forwarded to Bureau of Legal Services: _____

Respondent(s) [Full Name(s) of Owner(s) and/or Operator(s)]:

Mal Landfill Corporation

Address(es) of Respondent: 1838 North Broadway

St. Louis, Missouri 63102

Telephone: 314/241/3710

EPA Personnel
Involved in Case:

Environmental Protection Engineer Designated
by Control Bureau to Co-ordinate Bureau's
Activities Before and After Filing.

Surveillance Personnel
Who Collected Evidence

Surveillance Personnel
Who Collected Evidence

Name	Business Phone	Phone
Kenneth Mensing	618/345-0700	618/632-41
Pat McCarthy	" " "	618/935-27
William Child	217/786-6892	217/787-25
Andrew Vollmer	217/525-6760	217/544-65

Type of Case: ☐ Permit ☐ Variance ☒ Enforcement

A REFERRAL MEMO SHALL BE PREPARED CONTAINING AT LEAST THE FOLLOWING INFORMATION:

- 1) Name of Respondent.
- 2) Specific dates and times of observations.
- 3) Weather conditions on each such date.
- 4) Names of all persons present at the facility in question on each such date.

US EPA RECORDS CENTER REGION 5



412273

PICTURES DATED

INSPECTION DATE

ARTICLE III

DISPOSAL METHODS

Rule 3.01. SANITARY LANDFILL. Sanitary landfill operation shall be in accordance with Article IV.

Rule 3.04. OPEN DUMPING. Open dumping is prohibited.

3/31/73

3/31/73

7/02/73

4/01/73

4/01/73

7/10/73

5/10/73

5/10/73

7/24/73

5/11/73

5/11/73

7/25/73

Rule 3.05. OPEN BURNING. Open burning is prohibited.

Rule 3.06. GARBAGE FEEDING TO SWINE. Garbage feeding to swine shall be done only with prior approval of the Department and in accordance with the requirements prescribed in the approval document, and in conformity with the Illinois Revised Statutes, 1965, Chapter 8, Sections 192 through 202.

Rule 3.07. GARBAGE GRINDERS. Municipal or industrial garbage grinding and disposal shall be done only with the prior approval of the Department and in accordance with requirements prescribed in the approval document.

STATE OF ILLINOIS
ENVIRONMENTAL PROTECTION AGENCY

INTER-OFFICE CORRESPONDENCE

DATE: September 24, 1973
MEMO TO: Enforcement Services Section, DLPC
FROM: Surveillance Section, DLPC
SUBJECT: Referral Memo -- ST. CLAIR COUNTY - LPC
E. St. Louis/Mal-Milam

I Mal Landfill Corporation
1838 North Broadway
St. Louis, Missouri 63102

	<u>Date</u>	<u>Time</u>	<u>Weather</u>	<u>Persons Present</u>
II				
III				
IV	3/31/73	4:30 p.m.	Cloudy, 45° Prev. Rain	Child, Cat Operator
	4/01/73	10:00 a.m.	Cloudy, 45°	Child, Ken Hartbarger, Dale Dille
	5/10/73	2:30 p.m.	Ptly Cldy. 77°	Mensing, McCarthy
	5/11/73	1:40 p.m.	Clear, 75°	Mensing
	6/05/73	4:00 p.m.	Cloudy, 75°	Mensing, McCarthy, Dille
	7/02/73	3:15 p.m.	Sunny, 92°	Mensing, McCarthy
	7/10/73	3:15 p.m.	Sunny, 88°	Mensing
	7/24/73	12:00 p.m.	Ptly Cldy. 85°	Mensing, McCarthy, Vollmer
	7/25/73	10:30 a.m.	Sunny, 80°	Mensing, McCarthy, Vollmer, Dille
	8/28/73	5:15 p.m.	Sunny, 90°	Mensing, McCarthy, Hartbarger, Dille
	8/29/73	7:40 a.m.	Sunny, 75°	Mensing, McCarthy, Hartbarger, Dille
	9/06/73	2:45 p.m.	Clear, 80°	Mensing, McCarthy, Dille
	9/07/73	9:25 a.m.	Cloudy, 70°	Mensing, McCarthy, Dille

V	<u>Date</u>	<u>Nature and Content of Discussion</u>
	6/05/73	Dale Dille, Site Manager, was informed that refuse was observed in an area of ponded water on the site and that uncovered and

EVERY INTER-OFFICE LETTER SHOULD HAVE ONLY ONE SUBJECT.
ALL LETTERS TO BE SIGNED . . . NO SALUTATION OR COMPLIMENTARY CLOSING NECESSARY.

Date

thinly covered refuse was observed over much of the site. I told Dille that the active fill face which ranged to 15 feet in height should be reduced and that the refuse should be compacted in shallow layers.

Dale Dille was informed that open dumped chemical barrels, demolition waste, garbage and general refuse were observed on July 24, 1973 and today. I told him that demolition and general refuse were not being properly spread and compacted. Informed Dille that several acres of the site were inadequately covered. Told him that a permit was required to accept liquids and sludge materials.

Mr. Dille stated that a piece of equipment was working in the barrel area providing for adequate drainage and struck a barrel which caught on fire and spread to the other barrels. Mr. Hartbarger, Mal President, stated that old barrels buried twenty (20) years ago were the cause of the fire. He further stated that they are working on an alternative to dumping the chemical barrels. Mensing observed a Budweiser truck dumping caustic bottle washing liquid into the fill and told Mr. Hartbarger that no liquids should be dumped without first obtaining a permit to do so. He said that he had told them many times to stop dumping the liquid. Mr. Hartbarger was told to contact Springfield, concerning dumping of liquids and sludges and he said he would do so.

Mr. Dille was informed that exposed and thinly covered refuse was observed over much of the site and that more cover was needed. He stated that all of the previously filled areas had been adequately covered, but that the sand utilized as cover sifts down through the refuse. He was told about the liquids and sludges observed on the site and that a permit was required to accept such wastes.

Mr. Dille was informed that open dumped refuse was observed on the site and that the refuse was not being spread and compacted into shallow layers. Mr. Dille stated that he would cover all the refuse and that we should return in a week or so to reinspect the site.

Mal Landfill Corporation
1838 North Broadway
St. Louis, Missouri 63102

VII Diagram of facility attached.

<u>Date</u>	<u>Document</u>	<u>Content of Document</u>
3/31/73	Inspection Report	
4/01/73	Inspection Report	
4/03/73	Letter	Letter from Engineering firm retained by Mal-Milam commenting on preliminary permit work concerning soil borings and piezometers.
4/24/73	Letter	Letter to Engineering firm containing comments relative to the submittal of the preliminary site plan.
5/10/73	Inspection Report	
5/11/73	Inspection Report	
6/05/73	Inspection Report	
6/21/73	Letter to Mal-Milam following June 5, 1973 inspection	
7/02/73	Inspection Report	
7/10/73	Inspection Report	
7/17/73	Memo from Patrick McCarthy	Memo describing meeting with Mr. John Leslie, U. S., E.P.A., concerning pollution of old Cahokia Creek.
7/19/73	Letter	Letter to Mal-Milam following July 2, 1973 inspection.
7/24/73	Letter	Letter to Mal-Milam following July 10, 1973 inspection.
7/24/73	Inspection Report	
7/25/73	Inspection Report	
8/17/73	Letter	Letter to Mal-Milam following July 24, 1973 inspection.
8/28/73	Inspection Report	
8/29/73	Inspection Report	
9/04/73	Memo	Memo from Kenneth Mensing describing the barrel and chemical fire which occurred at the site on August 28, 29, 1973.
9/06/73	Inspection Report	
9/07/73	Inspection Report	

<u>Date</u>	<u>Document</u>	<u>Content of Document</u>
9/18/73	Letter	Letter to Mal-Milam following August 28 and 29, 1973 inspections.
9/18/73	Letter	Letter to Mal-Milam following September 6 and 7, 1973 inspections.

- IX Pictures of facility attached.
- X A chemical and putrid odor were discernible on the site during most of the inspections. Voluminous black noxious smoke evolved from the August 28 and 29, 1973 chemical barrel fire.
- XI No nearby residences.
- XII Water Pollution Threat: None investigated.
- XIII Total file included.
- XIV Legal Description: NW 1/4 of Section 5, T.2N., R.9W., 3rd P.M.
St. Clair County, Illinois
- XV Permit Status: Preliminary permit work has been undertaken, but no permit has yet been issued.

st. clair

COUNTY - Land Pollution Control

e. st. louis

mal-milam

ENVIRONMENTAL PROTECTION ACTPICTURES DATEDINSPECTION DATED**SECTION 9**

No person shall:

a Cause or threaten or allow the discharge or emission of any contaminant into the environment in any State so as to cause or tend to cause air pollution in Illinois, either alone or in combination with contaminants from other sources, or so as to violate regulations or standards adopted by the Board under this Act;

8/28/73

8/28/73

8/29/73

8/29/73

c Cause or allow the open burning of refuse, conduct any salvage operation by open burning, or cause or allow the burning of any refuse in any chamber not specifically designed for the purpose and approved by the Agency pursuant to regulations adopted by the Board

same as above

same as above

SECTION 12

No person shall:

a Cause or threaten or allow the discharge of any contaminants into the environment in any State so as to cause or tend to cause water pollution in Illinois, either alone or in combination with matter from other sources, or so as to violate regulations or standards adopted by the Pollution Control Board under this Act;

d Deposit any contaminants upon the land in such place and manner so as to create a water pollution hazard;

5/10/73

3/31/73

8/28/73

5/11/73

4/01/73

8/29/73

8/28/73

5/10/73

9/06/73

8/29/73

5/11/73

9/07/73

6/05/73

7/02/73

7/10/73

7/24/73

7/25/73

PICTURES DATED

INSPECTION DATED

SECTION 21

No person shall:

a Cause or allow the open dumping of garbage;

3/31/73 9/06/73
4/01/73 9/07/73
5/10/73
5/11/73

3/31/73 7/24/73
4/01/73 7/25/73
5/10/73 9/06/73
5/11/73 9/07/73

b Cause or allow the open dumping of any other refuse in violation of regulations adopted by the Board;

3/31/73 9/06/73
4/01/73 9/07/73
5/10/73
5/11/73

3/31/73 7/24/73
4/01/73 7/25/73
5/10/73 8/28/73
5/11/73 8/29/73
7/02/73 9/06/73
7/10/73 9/07/73

c Abandon, dump, or deposit any refuse upon the public highways or other public property, except in a sanitary landfill approved by the Agency pursuant to regulations adopted by the Board;

d Abandon any vehicle in violation of the "Abandoned Vehicles Amendment to the Illinois Vehicle Code", as enacted by the 76th General Assembly;

e Conduct any refuse-collection or refuse-disposal operations, except for refuse generated by the operator's own activities, without a permit granted by the Agency upon such conditions, including periodic reports and full access to adequate records and the inspection of facilities, as may be necessary to assure compliance with this Act and with regulations adopted thereunder, after the Board has adopted standards for the location, design, operation, and maintenance of such facilities;

3/31/73 7/02/73
4/01/73 7/10/73
5/10/73 7/24/73
5/11/73 7/25/73
6/05/73

f Dispose of any refuse, or transport any refuse into this State for disposal, except at a site or facility which meets the requirements of this Act and of regulations thereunder.

PICTURES DATED

INSPECTION DATED

ARTICLE V

SANITARY LANDFILL OPERATION

Rule 5.01, GENERAL. All operation of the sanitary landfill shall be in accordance with the approved plan.

Rule 5.02, SITE ACCESS. Access to the site shall be permitted only during the hours when operating personnel are on the site.

Rule 5.03, DUMPING AREA. Dumping of refuse on the site shall be confined to the smallest practical area.

5/10/73

5/11/73

7/24/73

7/25/73

Rule 5.04, UNLOADING. Unloading shall be supervised. Portable fences shall be used when necessary to prevent blowing litter from the unloading site. The fill and surrounding area shall be policed as necessary to collect all scattered material.

7/02/73

Rule 5.05, EQUIPMENT. Sufficient equipment in operational condition shall be available at the site at all times to permit operation of the landfill according to the approved plan.

Rule 5.06, SPREADING AND COMPACTING OF REFUSE. As rapidly as refuse is admitted to the site, it shall be spread and compacted in shallow layers of approximately two to three feet in compacted depth depending upon the type of material and the compaction equipment. The completed cell shall consist of the refuse admitted and compacted during one working day, regardless of overall height and area covered.

3/31/73

4/01/73

5/10/73

5/11/73

5/10/73

5/11/73

6/05/73

7/02/73

7/24/73

7/25/73

PICTURES DATED

INSPECTION DATED

5.07. COVER. Cover material shall be of such quality to prevent fly and rodent attraction and breeding, blowing release of odors, fire hazards, and unsightly appearance, which will permit only minimal percolation of surface water on properly compacted. Cover shall be applied as follows:

- (a) Daily Cover. A compacted layer of at least six (6) inches of material shall be used to cover all exposed refuse at the end of each working day; except that on surfaces that will not receive an additional depth of refuse or the final cover within 60 days, a compacted layer of cover of at least one (1) foot shall be applied.

3/31/73
4/01/73
5/10/73
5/11/73

3/31/73 7/02/73
4/01/73 7/24/73
5/10/73 7/25/73
5/11/73
6/05/73

- (b) Final Cover. A compacted layer of at least two (2) feet of material in addition to the daily cover shall be placed over the entire surface of all completed portions of the fill within six (6) months following the final placement of refuse. Final cover shall be graded as provided on the approved plan and to prevent ponding. The surface of the final cover shall be maintained at the plan elevation at all times, by the placement of additional cover material where necessary.

Rule 5.08. DEPOSITION OF LIQUIDS AND HAZARDOUS MATERIALS. Sewage solids or liquids, septic tank pumpings, and other liquids or hazardous substances shall not be discharged to a sanitary landfill until written approval has been obtained from the Department. Special provisions may vary from site to site depending upon local conditions, and will be specified in the approval letter.

5/10/73
5/11/73

3/31/73 7/02/73
4/01/73 7/10/73
5/10/73 7/24/73
5/11/73 7/25/73
6/05/73

Rule 5.09. VECTOR CONTROL. Insect and rodent control measures shall be employed as directed by the Department.

Rule 5.10. SALVAGE OPERATIONS. Salvage operations are not recommended in conjunction with a sanitary landfill. In the event that salvage operations are carried out, the following conditions shall apply:

- (a) All salvage operations shall be conducted in a sanitary manner.
(b) Salvage operations shall be confined to an area remote from the operating face of the fill.
(c) Salvage operations shall not interfere with, or otherwise delay the fill operation.
(d) All salvaged materials shall be removed from the landfill site daily, or properly stored such that they will not create a nuisance, rat harborage, or unsightly appearance.

PICTURES DATED

INSPECTION DATED

Rule 5.11. SANITARY LANDFILL VARIATION. Large quantities of non-combustible and non-putrescible waste such as boiler-house cinders, broken paving, or materials resulting from construction or demolition operations may be disposed of at a sanitary landfill by open dumping. Such material shall be leveled and spread at sufficient intervals to prevent unsightly appearance or rodent harborage, and shall be finally covered as required for a completed sanitary landfill in Rule 5.07, unless approved plan provides for other cover.

Rule 5.12. PROHIBITED ACTIVITIES. The following activities shall be prohibited in conjunction with, or upon the site of the sanitary landfill.

- (a) All scavenging operations. Scavenging shall mean the manual sorting of refuse, either in the trucks, at the face of the fill, or in unconfined truck discharge areas.
- (b) All feeding of farm or domestic animals.

(c) Deposition of refuse in standing water.

5/10/73
5/11/73

5/10/73
5/11/73
6/05/73
7/10/73

(d) Burning, except in an approved incinerator under Rule 3.02.

Rules and Regulations

<u>ie</u>	<u>Pictures dated</u>	<u>Inspection dated</u>
303(a)	9/06/73 9/07/73	8/28/73 9/06/73 8/29/73 9/07/73
303(b)	9/06/73 9/07/73	8/28/73 9/06/73 8/29/73 9/07/73
303(c)	Same as Above	Same as above
305(a)	Same as Above	Same as above
310(b)	8/28/73 9/06/73 8/29/73 9/07/73	8/28/73 9/06/73 8/29/73 9/07/73
311	8/28/73 8/29/73	8/28/73 8/29/73
312	8/28/73 8/29/73	8/28/73 8/29/73
314(f)		8/28/73 8/29/73